

Exhibit A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF IOWA**

In re:)	
)	Chapter 11
MERCY HOSPITAL, IOWA CITY, IOWA, <i>et al.</i> ,)	Case No. 23-00623 (TJC)
)	
Debtors.)	Jointly Administered
)	
)	Related to Docket No. [__]

**[PROPOSED] ORDER (I) AUTHORIZING THE DEBTORS TO (A) ADMINISTER,
SETTLE, AND WIND DOWN WORKERS’ COMPENSATION PROGRAM, AND (B)
PAY ADMINISTRATION EXPENSES FOR WORKERS’ COMPENSATION
PROGRAM, AND (II) GRANTING RELATED RELIEF**

Upon the motion (the “Motion”)¹ of the Debtors for entry of an Order (this “Order”), (i) authorizing the Debtors (a) to transition the Workers’ Compensation Program into an administration, settlement, and wind down phase; and (b) to pay all TPA Expenses from the Workers’ Compensation SIR Trust; and (ii) granting related relief, all as more fully set forth in the Motion; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Public Administrative Order* referring bankruptcy cases entered by the United States District Court for the Northern District of Iowa; and the matter being a core proceeding within the meaning of 28 U.S.C. § 157(b)(2); and venue of this proceeding and the Motion in this District being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court being able to issue a final order consistent with Article III of the United States Constitution; and due and sufficient notice of the Motion having been given under the particular circumstances; and it appearing that no other or further notice is necessary; and it appearing that the relief requested in the Motion is based on sound business purpose, in the best interests of the Debtors, their estates, their creditors, and other

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

parties-in-interest; and after due deliberation thereon; and good and sufficient cause appearing therefor; it is hereby

ORDERED, ADJUDGED, AND DECREED that:

1. The Motion is granted on a final basis as set forth herein.
2. The Debtors are hereby authorized to transition the Workers' Compensation Program into an administration, settlement, and wind down phase.
3. The Debtors, Hills Bank, and any other necessary parties are authorized and directed to pay all TPA Expenses from the Workers' Compensation SIR Trust.
4. Notwithstanding Bankruptcy Rule 6004(h), this Order shall be effective and enforceable immediately upon entry hereof.
5. The Debtors are authorized to take all actions necessary to implement the relief granted in this Order.
6. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated and entered this ____ day of February, 2024.

Honorable Thad J. Collins, Chief Judge

Prepared and Submitted By:

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